

BEFORE THE TENNESSEE REGULATORY AUTHORITY
NASHVILLE, TENNESSEE

REC'D TN
REGULATORY AUTH.

'98 FEB 12 PM 4 19

IN RE: BellSouth Telecommunications, Inc.'s)
Entry Into Long Distance (InterLATA))
Service in Tennessee Pursuant to Section 271)
of the Telecommunications Act of 1996

Docket No. 97-06309

CLERK OF THE
EXECUTIVE SECRETARY

PETITION TO INTERVENE

Comes the Consumer Advocate Division to file this Petition to Intervene in the above referenced proceeding. For cause the Petition would show:

I

1. That Petitioner is authorized pursuant to Tenn. Code Ann. §§ 65-4-118 and 65-5-210(b) to represent the interests of Tennessee consumers and is authorized to participate in any proceeding of this docket.

II

2. That BellSouth is a public utility operating under the laws of the State of Tennessee including but not limited to, Tenn. Code Ann. § 65-5-209.

III

3. That Tenn. Code Ann. § 65-4-123 establishes a policy in this State of protecting the interests of consumers.

4. That BellSouth's 271 application may adversely affect the overall interests of consumers and the public interest.

5. That the Consumer Advocate Division participated in the former proceeding, prior to the change of docket number and filed a Notice of Appearance in this docket, but is uncertain of the agency's processes.

6. That the Consumer Advocate Division has promulgated discovery requests to BellSouth in the time frame proposed by the Authority and there is no adverse effect on the schedule.

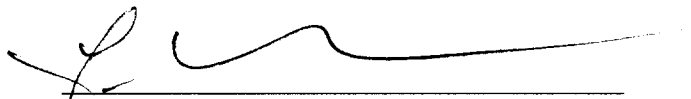
7. That the above referenced statutes provide a portion of the public policy of this state.

IV

Wherefore the Consumer Advocate Division prays that it be granted intervention in this proceeding and that BellSouth respond to the Division's data request.

Dated this 12th day of February 1998.

Respectfully Submitted,



L. Vincent Williams

CERTIFICATE OF SERVICE

I hereby certify that a copy of this Petition was served on the parties listed below by mail on this the 12th day of February 1998.

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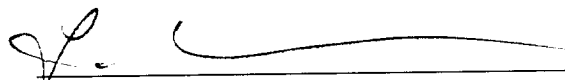
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